

MAR 13 2008

The December 13, 2007 Office Action rejected all claims, 1-13, pending in the application. Applicant respectfully requests consideration of the enclosed remarks and issuance of a timely notice of allowance.

### In the Claims

#### Claim Rejections

All claims, 1-13, stand rejected under 35 U.S.C. §102(e) as being anticipated by Teeple et al., U.S. Publication No. 2002-0120779 published on August 29, 2002. For the following reasons stated below, Applicant respectfully traverses these rejections.

#### Teeple Reference

In general, Teeple discloses a system and method for improved delivery of mobile messaging and personalized content. Specifically, Teeple discloses a system to allow mobile devices (e.g., handheld devices) to properly communicate with various host servers and receive data in the proper format. Mobile Rules Language (MRL) software enables reformatting and translation of data in one presentation format to data in another format. (See e.g., Teeple [0139]). Teeple discloses a solution to a problem encountered by small screen devices, such as mobile devices including cell phones, PDAs, etc., resulting from web documents being formatted only for large screen devices.

The disclosed methods of Teeple include a web server 220 that receives a HTTP request containing a URL from a small display device 210. The request is for a particular web site, hence the URL. Web server 220 includes a reformatting processor 260 and a redirector processor 250. When a request for a particular web site is made, the system initially reformats the data into data written in an intermediate markup language during a first pass (reformatting processor 260). On a second pass, the data is further processed according to a specific rule set for the corresponding mobile device. The redirector processor 250 redirects HTTP request 240 from device 210 to database 270 to retrieve the appropriate markup language and the device characteristics. (See e.g., Teeple [0032]-[0036], Figure 2).

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The reformatting processor (elements 260 and 42) is disclosed as a "tag-by-tag ML (mark-up language)" rewriting processor that applies external rule sets (stored in a database) to ML source data. ([0040]). Teeple defines "tags" at paragraph [0007] as "commands of the HTML...(which) provide a variety of functions including...defining special format and layout information in a Web document, embedding images and sound in a Web document, and embedding links to other Web documents." In other words, Teeple discloses tags as commands in a ML that tell a device how to format and layout data. Hence, the reformatting processor 260 is enabled to reformat data comprising tags from one ML (not processable by a device) to a second ML (processable by a device) such that the data is displayable at the device. In doing so, the reformatting processor is provided with rules for reformatting a tag in one ML to a tag in a second ML (see, e.g., [0044]-[0087]), each type of tag requiring a different rule. Thus, the "tags" disclosed by Teeple are well defined rules that are pre-determined and bound.

Teeple does refer to variables but it is only with regard to the reformatting rules, and not the content of a message. This is supported in paragraphs [0064]-[0071]. In which a reformatting rule results in "mypic.jpg" being replaced with "My picture". As such, the content of the document does not strictly change, merely the formatting of the document such that only supportable formatting is rendered at a device.

The Examiner erroneously equates the "tags" disclosed in Teeple with "substitutable variables" as presently claimed. However, as previously discussed, Teeple discloses tags to be formatting commands that are specific to a given mark-up language. Indeed, they are not "substitutable variables" replaced with "local information" as claimed by Applicant. Rather, "tags" are disclosed as commands which instruct a device on how to format and render data.

The Examiner has further erroneously equates reformatting of the tags from one ML to another ML as "replacing said substitutable variables in said message with said local information". While during the reformatting process "the <HTML> tag is replaced with a <wml> tag", this is akin to reformatting certain words or phrases in a given document from a given font, not supported by a device, to another font which is supported by a device so the device may render and display the given document

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without error. As such, the content of the document does not change, merely the formatting. Indeed, the <HTML> tag, as such, is not a substitutable variable anymore than a given word in a given font (in a given document) is a substitutable variable.

Furthermore, the "Universal Bit Broker" disclosed in Teeple (see, e.g., [0140]) translates a request for data from a device sent using a first communication protocol, to a second communication protocol such that the request may be understood by a server. The Universal Bit Broker then receives the requested data from the server and reformats the requested data from a first presentation format (i.e. from one markup language, as provided by the server) to a second presentation format (i.e. to another markup language, as understood by the device), prior to sending the data to the device.

In contrast to Teeple, the present application teaches an Internet Appliance may be configured with a pass-through messaging capability with one-way variable replacement. Further, a command or request message is sent to an intended recipient via the Internet Appliance and the Internet Appliance need not interpret the contents of the message. Rather, the Internet Appliance unpacks the message, replaces the variables it supports with actual values, and passes the messages to its intended recipient. Thereby eliminated is the need for a 3<sup>rd</sup> party application or user to supply local variable information, to have a portal further queried for local information, or to be limited to the type of local information gleaned from having requests made on behalf of 3<sup>rd</sup> party applications.

Indeed, Teeple is directed to an entirely different problem: how to translate data from one ML language to another such that data is renderable at a particular device. Teeple fails to teach or suggest "detecting said substitutable variables by replacing said substitutable variables in said message with said local information", as claimed in the present application. Rather, Teeple merely teaches reformatting a message such that the same content located at a server is rendered and displayed at a device: the content does not change, merely the formatting. As such, Teeple has no bearing whatsoever on the subject matter of the present application as claimed.

rejection with respect to claims 1-13 and issuance of a timely Notice of Allowance.

**CONCLUSION**

In view of the foregoing, Applicant requests the withdrawal of the Section 102 rejections to claims 1-13. Should the Examiner wish to discuss any of the above in greater detail or deem that amendments should be made to improve the application, then the Examiner is invited to contact the undersigned at the Examiner's convenience. Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

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Respectfully submitted,  
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